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Attorneys for GMAC MORTGAGE, LLC

**UNITED STATES BANKRUPTCY COURT**  
**DISTRICT OF NEVADA**

In re  
KEEN ELLSWORTH,  
Debtor(s).

Bankruptcy Case No. BK-S-10-12736-BAM  
Chapter 13

**GMAC MORTGAGE, LLC'S REQUEST  
FOR SPECIAL NOTICE AND SERVICE  
OF PAPERS AND RESERVATION OF  
RIGHTS**

TO: UNITED STATES BANKRUPTCY JUDGE, THE DEBTOR(S), AND ALL INTERESTED PARTIES

PLEASE TAKE NOTICE that the firm of PITE DUNCAN, LLP, attorneys for GMAC Mortgage, LLC hereby requests special notice of all events relevant to the above-referenced bankruptcy and copies of all pleadings or documents filed in relation to the above-referenced bankruptcy, including all pleadings or notices under Federal Rules of Bankruptcy Procedure, Rule 2002, the commencement of any adversary proceedings, the filing of any requests for hearing, objections, and/or notices of motion, or any other auxiliary filings, as well as notice of all matters which must be noticed to creditors, creditors committees and parties-in-interest and other notices as required by the United States Bankruptcy Code and Rules and/or Local Rules of the above-referenced bankruptcy court.

PITE DUNCAN, LLP, requests that for all notice purposes and for inclusion in the Master Mailing List in this case, the following address be used:

ACE VAN PATTEN  
PITE DUNCAN, LLP  
4375 Jutland Drive, Suite 200  
P.O. Box 17933  
San Diego, CA 92177-0933

Neither this Request for Special Notice nor any subsequent appearance, pleading, claim, proof of claim, documents, suit, motion nor any other writing or conduct, shall constitute a waiver of the within party's:

a. Right to have any and all final orders in any and all non-core matters entered only after de novo review by a United States District Court Judge;

b. Right to receive service pursuant to Fed. R. Civ. P. 4 made applicable to the instant proceeding by Fed. R. Bankr. P. 7004, notwithstanding Pite Duncan, LLP's participation in the instant proceeding. This Request for Special Notice shall not operate as a confession and/or concession of jurisdiction. Moreover, the within party does not authorize Pite Duncan, LLP, either expressly or impliedly through Pite Duncan, LLP's participation in the instant proceeding, to act as its agent for purposes of service under Fed. R. Bankr. P. 7004;

c. Right to trial by jury in any proceeding as to any and all matters so triable herein, whether or not the same be designated legal or private rights, or in any case, controversy or proceeding related hereto, notwithstanding the designation or not of such matters as "core proceedings" pursuant to 28 U.S.C. § 157(b)(2)(H), and whether such jury trial right is pursuant to statute or the United States Constitution;

d. Right to have the reference of this matter withdrawn by the United States District Court in any matter or proceeding subject to mandatory or discretionary withdrawal; and

e. Other rights, claims, actions, defenses, setoffs, recoupments or other matters to which this party is entitled under any agreements at law or in equity or under the United States Constitution.

Dated: March 12, 2010

/s/ Ace Van Patten  
4375 Jutland Drive, Suite 200  
P.O. Box 17933  
San Diego, CA 92177-0933  
(702) 413-9692  
NV Bar #11731  
Attorney for GMAC MORTGAGE, LLC

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing REQUEST FOR SPECIAL NOTICE AND SERVICE OF PAPERS AND RESERVATION OF RIGHTS was served on March 12, 2010.

Service was accomplished by the method and to the following as indicated:

BY ELECTRONIC NOTICE OR FIRST CLASS MAIL

Keen Ellsworth  
5117 Missy Marie Lane  
Las Vegas, NV 89130

George Haines  
Haines & Krieger, L.L.C.  
1020 Garces Ave.  
Las Vegas, NV 89101

Kathleen A. Leavitt  
201 Las Vegas Blvd. South, Suite 200  
Las Vegas, NV 89101

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on March 12, 2010, at San Diego, California.

/s/ Jennifer Branton  
JENNIFER BRANTON